Federal Caucus Public Comment Form

All comments on the All-H Paper—written, e-mail and oral—will be analyzed and considered in a summary report, with responses at the time of the final All-H paper. The comment period closes March 17, 2000.

Please hand in comments at the open house written comment table or mail them to: Federal Caucus Comment Record; c/o BPA-PL, 707 W. Main St., Suite 500, Spokane, Wa. 99201

Please use this page to comment on issues related to the Federal Caucus All-H Paper. Please use the Corps ElS public Comment form and the Corps John Day Study Comment Form to make comments on those documents. You do not have to limit your comments to this page only — use as many pages s necessary!

The Federal Caucus welcomes comments on all and any aspects of the All-H Paper. Comments related to the following might be among those you consider:

- · Scope and consideration
- · Range of options in each H
- · Adequacy of analyses presented
- Existing or additional analyses
- Adequacy of/or additional alternatives
- Appropriateness of goals and objectives

Please see the attached document for comments by the Payette River Water Users

Respectfully submitted by,

Mark Limbaugh, Executive Director

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March 14, 2000

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To Whom It May Concern:

The Payette River Water Users Association ("Association") is a non-profit corporation representing over 130,000 acres of irrigated farms and ranches located in the Payette River Basin of Idaho. Our members include family farmers, ranchers, municipalities and irrigation companies and districts who rely on water from the Payette River system for their livelihoods and the livelihoods of their respective citizens or customers. Our Association believes our water rights are at risk in the current debate over endangered and threatened salmon and steelhead recovery efforts in the Pacific Northwest. The following comments are meant to express the views of our membership on the issues of salmon recovery raised through the "All-H" discussion paper drafted by the Federal Caucius.

At the outset, the Payette River Water Users Association concurs with the comments submitted by the Committee of Nine and the Idaho Water Users Association. These comments are consistent with the views of our membership and should be given thorough consideration by the Federal Caucus in coordinating and finalizing any salmon recovery efforts.

The recovery alternatives that include dam removal on the Lower Snake River or the use of additional flows from Idaho reservoirs for flow augmentation would be very disruptive to the lives of many of our members.

In our opinion, dam removal will not recover the fish and may cause more harm to existing runs than currently estimated. It would take many years for the silt built-up behind these dams to re-settle downstream, a factor not studied thoroughly enough in the debate. The economic hardships caused by removing these dams from service would have a much greater impact than currently estimated. Just the lost source of over 3,000 megawatts of power productive capability would drive prices of electricity in the Pacific Northwest beyond our region's ability to pay, resulting in a huge transfer of money from the existing economy to the electric utilities industry.

Additional water from Idaho for flow augmentation would devastate Idaho's agricultural industry, drying up over 600,000 acres of productive farmland and costing Idaho over

\$430 million in lost economy. In addition, flow augmentation has not been proven to be particularly effective as a salmon recovery method. As the river is currently situated, there is not enough water produced in Idaho to effectuate prehistoric flow regimes. Flow targets set by federal agencies at Lower Granite are simply not realistic and are set too high. And Idaho, one of the few states to actually offer water flows on a trial basis, has not been given credit for working with the federal agencies on salmon recovery. Instead, federal agencies have studied taking up to one-million acre feet of additional water from Idaho storage reservoirs for flows downstream, adding more distrust to their relationship with the state and causing much worry and consternation among water users about their important water supplies.

The recovery methods not currently being promoted by scientists or environmental groups but with much promise in helping these magnificent fish to survive include improved predator management, improved fish passage hardware, and more study of ocean conditions and harvest as possible detrimental effects to the salmon populations in jeopardy. Also, hatchery operations have been and should continue to be improved to focus on recovering localized populations of salmon. Rearing "wild" salmon in hatcheries and nurturing stream-specific stocks continues to show much promise in recovering salmon populations in already healthy ranges of habitat.

In conclusion, we believe the focus has been on recovery measures that will not or cannot be accomplished, and that more focus should be placed on measures that can and should be improved to help recover these fish. Our concurrence with the Committee of Nine and the Idaho Water Users Association comments is consistent with this analysis and we hope that the Federal Caucus will, through this "All-H" process, produce a much clearer vision of practical and effective salmon recovery for the fish and the people of the Pacific Northwest.

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Cc: PRWUA Board of Directors
Idaho Water Users Association

Committee of Nine